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December 13, 2023

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Via ECF

The Honorable Nicholas G. Garaufis
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.
Criminal Docket No. 18-204 (S-2) (NGG) (VMS)

Dear Hon. Nicholas Garaufis:

The Court ordered the government to respond to the Defense's Motion for Reconsideration by December 11, 2023. The government has failed to comply. Accordingly, the Defense writes to respectfully request that the Court decide the Motion for Reconsideration and to urge the Court to compel the disclosure of the requested materials. There is no prejudice to the government in producing these materials which they have already provided to their own expert.

We thank the Court for its attention to this matter.

Dated: December 13, 2023
New York, New York

Respectfully submitted,

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